



100 William Street, 6th Floor
New York, NY 10038
Tel 212-417-3700
Fax 212-417-3890
www.mobilizationforjustice.org

VIA ECF

July 27, 2022

The Honorable James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Barker v. Rokosz, et al.*, 19 Civ. 00514 (KAM) (JRC)

Dear Judge Cho:

My office, along with Richman Law & Policy, represents Plaintiff Carla Barker in the above-referenced action. We write jointly with Defendant Steven G. Legum to submit a joint status report per the Court's July 5, 2022 Minute Order.

The Parties have finalized a settlement agreement that is nearly fully executed. Pursuant to the terms of that agreement, once it is fully executed, the Parties expect a stipulation of discontinuance will be filed in this action within 30 days.

Legum further requests that if the settlement agreement is not fully executed by August 5, 2022, that a conference should be scheduled before the Court. Plaintiff does not consent to this request and notes that only four business days have passed since Legum signed the agreement. Only one party has yet to execute the agreement, because of lack of technological capability to provide an electronic signature. However, that party is making arrangements as soon as possible to either mail a signed copy to counsel or sign the agreement in person. As reiterated to Legum, Plaintiff's counsel does not believe a conference would be a productive use of time for the Court or the Parties.

Respectfully Submitted,

/s/ Belinda Luu
Belinda Luu

/s/ Steven G. Legum
Steven G. Legum

cc: All Counsel of Record (by ECF)